## III. Remarks

Claims 6-8, and 11-15 were previously pending. Claims 6, 8, 12, 13, and 15 have been amended. No new matter has been added by the amendments.

Reconsideration of Claims 6-8, and 11-15 in light of the above amendments and the following remarks is respectfully requested.

### Claim Rejections under 35 U.S.C. §102

The Office Action indicated that Claims 6, 8, 11-12, and 15 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,523,696 to Saito et al. ("Saito"). Applicants respectfully traverse the rejection.

### Features of Present Application

As shown in Fig. A, a network enabled home appliance located within a private network can establish a direct tunneling session with a server on a global network such as the Internet. The network enabled home appliance stores the global address of the server. After the tunneling connection is established from the network-enabled home appliance to the server using the global address, the network-enabled home appliance located within the private network can be uniquely identified from the server, and thus it can be remotely controlled from a terminal which is located outside of the private network and connected to the Server via the Internet. Furthermore, commands are converted for the specific network-enabled home appliance type in the server before being routed to the network-enabled home appliance via the tunneling connection.

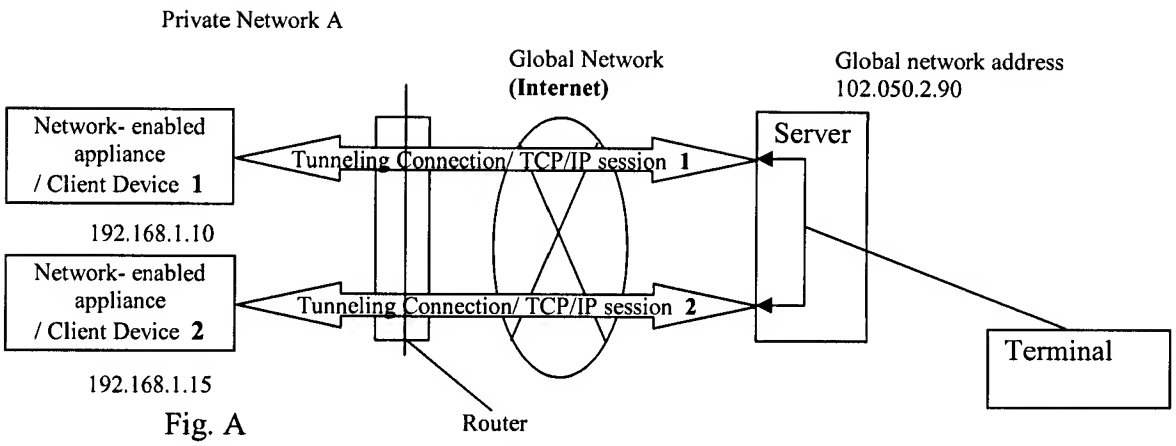



Fig. A

**Claim 6**

With respect to "a server located on the Internet" to which a network-enabled home appliance of Claim 6 is connected via the Internet, the Office Action states that it is disclosed in "AV Connection Device 205" as the service location proxy function 227 which "has a function to set this AV connection device as a proxy server of services." (Office Action at 3.) This same section of the Saito patent states, "the service location proxy function 227 also has a function to set this AV connection device as a proxy server of services and terminals connected to the 1394 bus, that is, the non-IP based IEEE 1394 specific protocol terminals/services that can only recognize and process a series of 1394 protocols." (Saito, col. 20, 37–41.) What the Saito patent describes is that an AV connection device can act as a proxy server for the non-IP based IEEE 1394 specific protocol terminals/services ***that are connected to the AV connection device in the same home network.*** This proxy server does not act as a server on the Internet, nor as a proxy server for the non-IP based IEEE 1394 specific protocol terminals that are connected to **the other** AV connection device which are connected via the Internet. Furthermore, a network-enabled home appliance is connected to the server via the Internet, not directly connected to the server (proxy server) itself. Accordingly, the Saito patent does not disclose a network-enabled home appliance which is connected to the server on the Internet as required by Claim 6.

In addition, the network-enabled home appliance of claim 6 includes "a control section configured to receive a packet from said server located on the Internet, the packet including a command for controlling the network-enabled home appliance, said command being in a

predetermined format specific to the network-enabled home appliance when received from said server".

In Saito, a control command that is received from the public network side is converted in the AV connection device by the 1394/IP command conversion function 229L

> "the service location proxy function 227...notify access requests for these advertised terminals/services to the **1394/IP command conversion function 229** as to as **map these access requests to the IEEE 1394 commands** or services, **upon receiving** these access requests **from the public network side** (IP side in general)" (Saito, col. 20, ll. 44-49.)

As indicated in the section above, it is clear that Saito's AV connection device does not receive a "command being in a predetermined format specific to the network-enabled home appliance when received from said server," as required in claim 6. Rather, the 1394/IP command conversion function in the AV connection device converts a control command to an IEEE 1394 command ***after*** receiving the unconverted control command.

Furthermore, Claim 6 requires "a server address storage section for storing a global address of said server located on the Internet" and "a tunneling establishing section for establishing a tunneling connection between the network-enabled home appliance and the server based on the global address of the server." Regarding these limitations, the Examiner points to Saito's column 5 that describes that a message received in the notifying unit contains an address and a multiplex identifier for identifying one service providing device. Therefore, the address or multiplex identifier is clearly not a global address of a server on the Internet, which is stored within a network-enabled home appliance of Claim 6. Consequently, the Examiner has also not shown a prior art disclosure of establishing of a tunneling connection based on a global address of a server on the Internet.

Accordingly, Saito fails to disclose a network-enabled home appliance of Claim 6.

**Claim 8**

The client device in Claim 8 has the limitation of being located within a private TCP/IP based network, having a relay device within, and being a device that is communicable with the relay device but cannot independently connect to the Internet. Saito describes non-IP devices such

as a DVD player 208 (1394 terminal) and an air conditioner 213 (LON terminal), which cannot independently connect to the Internet, but the Examiner has not shown a prior art disclosure of such devices being located in a TCP/IP based private network, nor having an configuration that enables a tunneling connection from a non-IP device to a server on the Internet by means of a relay device installed within the non-IP device.

With respect to the server on the Internet, the Office states that it is disclosed in "2nd AV Connection Device 205" and at the same time the Office refers to Fig. 43.

With respect of "2nd AV Connection Device 205", the reason that the "AV Connection Device 205" cannot be a server on the Internet as recited in Claim 8 is already explained in the remarks for Claim 6. The server of Claim 8 is a server on the Internet, and connected to a client device via the Internet and converts a command to be sent to the client device to a command in a predetermined format specific to the predetermined model for controlling the client device.

As for Fig. 43, the configuration shown in Fig. 43 shows an "IP Terminal 2102" and "AV Connection device 2201" connected to "2nd Network (Internet)." Fig. 43 does not disclose a server connected to the Internet.

Since Saito does not disclose an server on the Internet, Saito does not disclose a server on the Internet that includes "a command conversion section for converting a command to be sent to the client device to a command in a predetermined format specific to the predetermined model for controlling the client device" as required by Claim 8.

Saito fails to disclose the above limitations recited in independent Claim 8. Accordingly, applicants respectfully submit that Claim 8 is allowable over Saito.

**Claims 12, 13, and 15**

Independent Claims 12, 13, and 15 have the similar limitations as those noted about regarding Claims 6 and 8. Because of the similar reasons stated above, applicants submit that Claims 12, 13, and 15 are also allowable over Saito.

**Rejections under 35 U.S.C. §103(a) (Saito in view of Tsuchiya)**

The Office Action indicated that Claim 7 was rejected under 35 U.S.C. §103(a) as being

unpatentable over U.S. Patent No. 6,523,696 to Saito et al. ("Saito") in view of U.S. Patent No. 6,118,784 to Tsuchiya ("Tsuchiya"). Applicants respectfully traverse the rejection of Claim 7.

Applicants traverse the rejection because the Examiner has not shown how Tsuchiya could supply the required limitations missing from Saito (for example, an Internet connection system with a client device which has the limitation of being located within a private TCP/IP based network, having a relay device installed within, and being a device that is communicable with the relay device but cannot independently connect to the Internet).

In addition, Claim 7 depends from and further limits allowable Claim 6; Applicants submit that Claim 7 is also allowable as well.

Accordingly, Applicants request withdrawal of the rejection of Claim 7 under 35 U.S.C. §103(a) over Saito in view of Tsuchiya.

**Rejection under 35 U.S.C. § 103(a) (Saito in view of Sekiguchi)**

Claims 13 and 14 are rejected under 35 U.S.C. § 103(a) over Saito in view of U.S. 6,957,257 to Sekiguchi ("Sekiguchi").

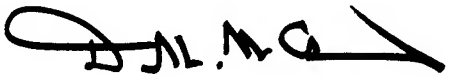
Applicants traverse the rejection because the Examiner has not shown how Sekiguchi could supply the required limitations missing from Saito (for example, an Internet connection system with a client device which has the limitation of being located within a private TCP/IP based network, having a relay device installed within, and being a device that is communicable with the relay device but cannot independently connect to the Internet).

Accordingly, Applicants request withdrawal of the rejection of Claims 13 and 14 under 35 U.S.C. §103(a) over Saito in view of Sekiguchi.

## IV. Conclusion

In light of the foregoing, it is believed that all matters set forth in the Office Action have been addressed and that independent Claims 6, 8, 12, 13, and 15 are in condition for allowance. Dependent Claims 7, 11, and 14 depend from and further limit the independent claims and, therefore, are allowable as well.

Respectfully submitted,



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Gayle Conner

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